

JUL 7 1986

Docket No. 50-482
License No. NPF-42
EA 86-84

Kansas Gas & Electric Company
ATTN: Glenn L. Koester
Vice President - Nuclear
P. O. Box 208
Wichita, Kansas 67201

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY
(NRC INSPECTION REPORT NO. 50-482/85-44)

This refers to the inspection conducted on December 2-5, 1985 at the Wolf Creek Generating Station, Burlington, Kansas. This was a followup inspection to a security matter identified to the NRC by your staff on November 4, 1985. An enforcement conference to discuss these matters was held on November 25, 1985, at the Region IV offices in Arlington, Texas.

As determined by your staff, the inspection confirmed that multiple uncontrolled access paths existed from the Owner Controlled Area (OCA) into the Protected Area (PA) and in two instances into Vital Areas (VA). It appears that this condition has existed since the storm drain system was installed, and the plant has been in violation of NRC regulations and its security plan since the operating license was granted on March 11, 1985. The causes for this situation included design oversight during the system planning stage, construction deficiencies which resulted in the failure to install some manway covers in accordance with the drawings, and the failure of the startup testing/surveillance program to identify these deficiencies. This violation demonstrates a weakness in the management oversight of coordination between the various organizational entities which may affect facility security.

To emphasize the need to provide integrated management control of the security program, I have been authorized, after consultation with the Director, Office of Inspection and Enforcement, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of Forty Thousand Dollars (\$40,000) for the violation described in the enclosed Notice. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986) (Enforcement Policy), the violation described in the enclosed Notice has been categorized at a Severity Level II. The violation has been categorized at Severity Level II because two of the elements of access control, namely barrier and monitoring, were inadequate at both the protected area and vital area barriers. The basic civil penalty for a Severity Level II violation is \$80,000. The NRC Enforcement Policy allows for reduction

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of a civil penalty under certain circumstances. In this case, the base civil penalty is reduced by 50 percent because of your prompt identification and reporting of the incident as soon as you became aware of it, because of your prompt and extensive corrective actions, and because of your prior good performance in the security area. However, further mitigation is not warranted because of the severity of the violation, the multiple examples of pathways from outside the protected area into your facility, and because of the duration of these barrier degradations.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

The material enclosed herewith contains Safeguards Information as defined by 10 CFR 73.21 and its disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended. Therefore, the material will not be placed in the Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

ORIGINAL SIGNED BY
ROBERT D. MARTIN

Robert D. Martin
Regional Administrator

Enclosure:
Notice of Violation and
Proposed Imposition of
Civil Penalty

cc: Kansas Radiation Control Program Director

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Kansas Gas & Electric Company

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